

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Digital Audio Broadcasting Systems and)	MM Docket No. 99-325
Their Impact on the Terrestrial)	
Radio Broadcast Service)	

To: The Secretary, Federal Communications Commission
Attn: Media Bureau

COMMENTS

Radio Training Network, Inc. ("RTN"), submits these comments in response to the Commission's Public Notice, *Comment Sought on Joint Parties Request for FM Digital Power Increase and Associated Technical Studies*, DA 08-2340 (released October 23, 2008). In the Public Notice, the Commission solicited comments on a proposal by Joint Parties to allow stations to broadcast with a digital operating power up to 10% of their analog power. The Public Notice also requested comment on studies by iBiquity Digital Corporation and National Public Radio, Inc. ("NPR"), in response to the Joint Parties' request.

RTN is the licensee of fourteen noncommercial educational radio stations.¹ RTN currently broadcasts digitally on one of its stations, WLFJ-FM, Greenville, South Carolina, and plans to begin digital broadcasts in January on WLFS(FM), Port Wentworth, Georgia.

¹ KWND, Springfield, Missouri; WAFJ, Belvedere, South Carolina; WAQV, Crystal River, Florida; WCCE, Buies Creek, North Carolina; WHIJ, Ocala, Florida; WIZB, Abbeville, Alabama; WJFH, Sebring, Florida; WJIS, Bradenton, Florida; WJLF, Gainesville, Florida; WLFJ-FM, Greenville, South Carolina; WLFS, Port Wentworth, Georgia; WLPJ, New Port Richey, Florida; WMBJ, Murrells Inlet, South Carolina; and WRTP, Roanoke Rapids, North Carolina

Additionally, once more listeners invest in digital receivers, RTN plans to expand its digital services to four other markets.

RTN has found in its year of digital broadcasting on WLFJ-FM in the Greenville, South Carolina, market that its HD-2 and HD-3 signals reliably reach listeners in the station's 70 dBu contour. The digital signal outside the 70 dBu contour is not on par with its analog signal. In order for digital broadcasting to be successful, it must reach a station's listening audience. This will only happen once the digital signal consistently serves a station's listening area with a signal comparable to its analog signal. For this reason, RTN supports a limited increase in digital operating power.

RTN recognizes the concerns expressed both by NPR and other commenters that an increase in digital power will cause interference to analog signals. In order to further digital broadcasts while avoiding the possible interference that may occur if stations are allowed to digitally broadcast at 10% of their analog power, RTN proposes an initial increase in digital operating power to 5% of a station's analog power. At this power level, RTN estimates that it could increase both its current Greenville, South Carolina, digital listening audience and its soon to be Port Wentworth, Georgia, audience by 50% and provide a signal on par with its analog signal. Once at this digital power level, RTN proposes that stations be examined on a case by case basis to determine whether a further increase in digital operating power would impact first adjacent stations.

WHEREFORE, RTN respectfully requests that the Commission allow stations to broadcast with a digital operating power that is 5% of the stations' authorized analog power.

Respectfully submitted,

RADIO TRAINING NETWORK, INC.

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November 26, 2008